



JOINT MANAGEMENT PLAN REVIEW

Scoping Comments: Water Quality – Desalination

The MBNMS received a variety of comments during the public scoping process about desalination throughout the region. It also received a large number of more general comments about the need for conservation of marine resources. A summary of these comments is presented below. This is meant to be a qualitative rather than quantitative display of comments received, as in some cases essentially the same comment was received multiple times from different individuals.

Scoping Comments: Desalination

- Concerned about cumulative effects of continuous discharges such as that from desalination plants or power plants.
- Sanctuary should be concerned about the impacts of desalination plants from construction and brine effluent discharge.
- Concerned about environmental degradation associated with water intake, discharge of brine, population growth issues and energy use related to desalination.
- Concerned about the proliferation of desalination plants and the potential expansion of offshore drilling.
- Sanctuary should investigate potential negative impacts of desalination on resources, and provide more input to the Regional Water Quality Control Boards.
- Improve desalination technologies; investigate use of transportable desalination barges.
- Restrict small private project specific desalination plants; allow desalination only for public benefit.
- Encourage regional solutions regarding desalination.
- The Sanctuary should prohibit desalination, because brine discharge would affect the ecosystem.
- Desalination should be addressed in the revised management plan.
- Sanctuary should develop a regional desalination policy.
- Sanctuary should be open to the possibility of desalination (local communities need water).
- Beach nourishment and marine disposal should be addressed in the revised management plan.
- Sanctuary should regulate discharge into ocean by industrial plants/facilities.

Scoping Comments: Ecosystem Protection and Biodiversity Conservation: (General category)

- Need more conservation in general.
- Goal of MBNMS should be to protect and preserve.
- It is much better economically (and easier) to save species and ecosystems before they become endangered or compromised in some way. Protection now makes the most long-term sense.
- Concerned about loss of species biodiversity and abundance, impacts to habitat, impacts to predator/prey interactions.



Scoping Comments: Coastal Development—Coastal Armoring

- Term “sanctuary” is a misnomer. True sanctuary status is nearly impossible to establish in the marine environment, save some marine caves or extreme deep-water sites populated only by resident species and devoid of any effects of ocean current and free from impacts of pollution.
- Coastal habitat restoration is extremely important.
- Consider regulation with long-term vision (erosion lasts longer than 50 years).
- Management should strive for long-term sustainable use (e.g., not taking juvenile fish). Appreciates regional approach to scoping process, to capture local issues.
- The Sanctuary needs to find the right balance between use and protection.
- More protection is needed in general for the ecosystem and biodiversity.
- Resource protection should be the main priority.
- Strengthen resource protection; do not allow local control to undermine this.
- Expand sanctuary concept to unify and make consistent resource protection, for better management of resources.
- Use holistic management practices that focus on entire watersheds.
- Sanctuary should look at the big picture of overall environmental impacts, and manage the resources appropriately. For example trawling has significant impacts, yet much more attention is given to fiber optic cables.
- Sanctuaries should ensure comprehensive coverage with overlapping jurisdiction, to improve resource protection.
- Sanctuaries should continue to provide consistent habitat protection.
- Recognize intrinsic values and aesthetics as well as ecological values.
- Create more of a policy balance between conservation and use, with a strong educational program being the key to achieving this balance.
- Sanctuary should consider ecological trade offs. In some cases terrestrial impacts from alternatives to Sanctuary restrictions are much worse.
- The Sanctuary should be involved in enhancing near-shore ecosystems through research and staff involvement in other agency processes.
- We urge the National Marine Sanctuary Program to ensure that any issues considered during JMPR process be considered in the context of the National Marine Sanctuaries Act’s primary goal of resource protection. We strongly advocate for the adoption and enforcement of strong policies and regulations that provide maximum protection of Sanctuary resources.
- Revised management plans should contain directives and timelines for developing specific action plans focused on protecting, and where necessary, restoring, natural habitats, populations, and ecological processes. Plans should also contain specific directives and management measures on certain issues.
- Integrate marine research in resource management decisions.
- Try thinking of the sanctuary as a gift as well as a resource.
- Remember to think and plan as systemically as possible, not just about distinct and separate issues, but about all the connections and boundaries and overlaps: coastlines and jurisdictions and regions and ecosystems and partnerships and nexuses and all those connections.
- “Seamlessness” should be the goal of Sanctuary management.
- Sanctuary should work with land management agencies.



Desalination Comments Received from the Sanctuary Advisory Council:

- The MBNMS should fully implement its existing water quality protection plans and develop new plans addressing point sources and riparian/wetland issues. *The MBNMS should also address emerging water quality issues such as desalination, invasive species, and cruise ship discharges.*
- Sewage, desalination, runoff are all very serious threats to ecosystem. Public wants strong action against pollutants – threat to otters and other marine life – and public is supportive of conservation of water rather than new development requiring desal. Keep supporting this very successful sanctuary program.